

Seth M. Lehrman (*Admitted Pro Hac Vice*)  
seth@lehrmanlaw.com  
LEHRMAN LAW  
6501 Park of Commerce Blvd., Suite 253  
Boca Raton, FL 33487  
Telephone: 754-778-9660

*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Jane Doe,

Plaintiff,

v.

Embry-Riddle Aeronautical University, Inc.,  
a Florida not for profit Corporation,

Defendant.

No. 3:24-cv-08100-SMB

**JOINT STIPULATION FOR  
EXTENSION OF CASE  
DEADLINES**

(First Request)

Plaintiff Jane Doe and Defendant Embry-Riddle Aeronautical University, Inc. (“ERAU”), pursuant to the LRCiv 7.3, and through their respective undersigned counsel, hereby respectfully submit the following Joint Stipulation and separate (Proposed) Order to modify by approximately 30 days the current remaining discovery pretrial deadlines and deadline to engage in settlement talks, set forth in the Court’s Case Management Order [DE 44].

Good cause exists for the requested extensions because the Parties have exercised diligence to comply with the deadlines set forth in the existing Case Management Order. Despite the Parties’ efforts, they are unable to complete discovery under the present deadlines and seek an extension to comply with the various deadlines, due to delays outside of the Parties’ control, including Hurricanes Helene and Milton and ERAU’s trial schedule.

Plaintiff had previously set the R. 30(b)(6) deposition of Defendant on October 11, 2024. However, the parties agreed to cancel and reset this deposition because a hurricane

was affecting Daytona Beach, Florida, where Defendant's representative is located. Counsel for both parties have agreed to reset the deposition of Defendant to February 20, 2025.

Accordingly, the Parties request approximately 30-day extensions of time for each of the following deadlines: fact discovery, expert disclosures, rebuttal expert disclosures, expert depositions and good faith settlement talks. If the requested extensions are granted, the new deadlines would be as follows:

Event	Current Deadline	Proposed Deadline
Fact discovery	2/28/2025	3/28/2025
Expert Disclosures	3/28/2025	5/2/2025
Rebuttal expert disclosures	4/25/2025	5/30/2025
Expert Depositions	5/30/2025	6/27/2025
Good Faith Settlement Talks	2/28/2025	4/18/2025

This is the first request by the Parties for the modification of the Case Management Order. The Parties have exercised diligence to comply with the existing deadlines but cannot comply with them without suffering unfair prejudice, and an extension is needed to ensure the fair administration of justice.

For the foregoing reasons, the Parties respectfully request that the Court enter the Order lodged concurrently with this Stipulation.

DATED this 14th day of January, 2025.

LEHRMAN LAW

SNELL & WILMER L.L.P.

By: s/ Seth M. Lehrman  
 Seth M. Lehrman  
 6501 Park of Commerce Blvd.  
 Suite 253  
 Boca Raton, FL 33487  
*Attorneys for Plaintiff*

By: s/ Joshua Woodard  
 Joshua Woodard  
 Audrey E. Chastain  
 One East Washington Street  
 Suite 2700  
 Phoenix, AZ 85004  
*Attorneys for Defendant*

1 GALLAGHER & KENNEDY, P.A.

2 By: s/ Matthew R. Boatman

3 Matthew R. Boatman

4 2575 E. Camelback Rd., 11<sup>th</sup> Floor

5 Phoenix, AZ 85016

6 *Attorneys for Plaintiff*

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